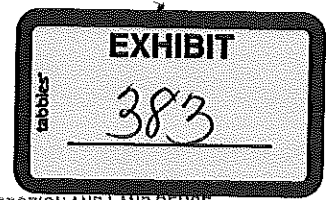




TOWN OF WOODSTOCK

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BUREAU OF WATER PROTECTION AND LAND REUSE
OFFICE OF THE BUREAU CHIEF



February 3, 2010

FEB 09 2010

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Attn: Paul E. Stacey
Dept. of Environmental Protection
Bureau of Water Protection and Land Reuse
Planning & Standards Division
79 Elm Street
Hartford, CT 06106-5127

Re: Comments on Proposed Stream Flow Regulations

Dear Mr. Stacey,

This letter is in response to the exemption for 'maintenance and repair to a dam or seasonal drawdowns of recreational lake' (or other bodies of water) from the new proposed Stream Flow Regulations.

It has come to my attention that the in the past drawdowns of Bungee Lake and Witches Woods Lake have been done without any notice to the town or to downstream property owners, including farmers. Also, the federally managed Thompson Dam has been similarly drawn down without notice to downstream property owners and has had similar effects. Considering, this is not an uncommon occurrence statewide, I would like to take the opportunity to comment.

The problems that I have been made aware of by local farmers involve crop damage and/or complete loss of crops in some instances as well as having to spend money and time repairing fields. As a town planner, I am concerned about this for several reasons, specifically related to water quality.

Allowing any managing party of a dam or other water body to release water at a rate that can flood downstream properties compromises the quality of the water downstream through additional erosion and sedimentation or through flooding agricultural fields that may have fertilizers, pesticides, etc. that may be carried into the flow. As you know, this resource is relied on by people, businesses and animals for basic survival and for businesses, including farms, to maintain their economic function. However, not providing even basic guidelines about the rate at which the water may be released or the time of year is not protecting the water quality, the other users of this resource, or the downstream property owners that may suffer as a result.

Farmers and businesses alike are already facing complicated economic challenges. We do not need to exacerbate their financial struggles by causing them to lose crops or suffer other unnecessary hardship. I understand at any time there may be a natural rainstorm which may release flood-level flow, however that has always been out of our control.

We do control the timing and rate at which these waterbodies are drawn down. Therefore, we should at least make an effort to encourage those that manage the waterbody to follow basic guidelines such as a slow release over a specified minimum length of time. If a simple system could be set up where the waterbody manager can notify the town of their scheduled release by a certain date, then interested downstream property owners would know when to contact the town to obtain the schedule. Hopefully, this system could reduce the potential crop damage and loss of fertilizers/pesticides which may have to be re-applied as a result. Additionally, but unrelated to flow, I have heard of wells near Witches Woods Lake going dry coinciding with the drawdown.

As the single town planner / zoning enforcement officer in a large town, I certainly understand the constraints of limited manpower and budgets, and therefore advocate for a simple solution that does not result in much of an increase in paperwork or inspections.

As far as my comments being more related to 'too much flow', being protected *from* the flow should be as important as protecting the stream from too low a flow or poor quality. Also, if the release or drawdown is not managed well it could result in low flow post-drawdown if we experience a drought.

I appreciate the opportunity to comment as well as the time and efforts all parties have contributed to putting the proposed Stream Flow Regulations together. Keep up the good work!

Sincerely,



Delia P. Fey, AICP
Town Planner / ZEO

Cc: Jean Pillo, Watershed Conservation Coordinator, Thames River Basin
Partnership - via email
Eric Thomas, CT DEP - via email